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June 11, 2018

Via E-file

The Honorable Cathy L. Waldor
U.S. Magistrate Judge for the District of New Jersey
Martin Luther King, Jr. Federal Building & Courthouse
50 Walnut Street
Newark, New Jersey 07101

Re: United States Vs. Steven Bradley Mell

Dear Your Honor:

Please find this letter and attached exhibit as a supplement to our previously submitted Memorandum on the Release of Steven Bradley Mell pending trial.

As requested by our firm, Daniel Coleman of Creative Solutions Investigative Services, conducted several interviews of friends and colleagues in an attempt to understand Mr. Mell's application for a New Firearms Duplicate Firearms ID, as well as for two handguns. Mr. Coleman interviewed Evan Van Gilson, who is a long-term associate of Steven Mell and owner of an aviation business which leases a helicopter from Mr. Mell's WFNW, LLC. Mr. Van Gilson is also former law enforcement officer with a family legacy in law enforcement as his father was the former chief of Holland Township, NJ.

Mr. Van Gilson recalls an early May 2018 conversation with Mr. Mell regarding the coyote issue he was having on his property.

Mr. Van Gilson recalls saying to Mr. Mell that he should keep his new puppy (Mr. Van Gilson described it as a husky mix breed), away from the tail rotor of the helicopter, as the dog could be struck by the rotor. Mr. Mell then proceeded to tell Mr. Van Gilson about

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an incident that he had involving two coyotes and his dog. Mr. Mell said to Mr. Van Gilson, "Hey, last night I had two coyotes in the yard." Mr. Van Gilson responded, "Why didn't you shoot it?" Mr. Mell told him that he did not have a gun and Mr. Van Gilson stated, "You should get one." Mr. Mell told him that the incident took place during the daytime and the coyotes were 100 yards from Mr. Mell and his dog. Mr. Van Gilson told Mr. Mell that the situation was potentially very dangerous, as coyotes are nocturnal animals and not usually outside during the day. Mr. Van Gilson lives in a rural area and is aware of the threat that coyotes pose to family pets. [Exhibit "Q" (Interview of Evan Van Gilson, dated May 21, 2018)]

Subsequently, Mr. Van Gilson advised Mr. Mell that he needed to apply for a duplicate firearms ID, because of his change of address after obtaining his previous ID.

Mr. Mell then proceeded to tell Mr. Van Gilson that he did not know where his NJ firearms ID card was. Mr. Van Gilson advised him that he can get a replacement ID card, which he would have to get in any case, because of his change of address from when he first obtained his ID card.

[Exhibit "Q" (Interview of Evan Van Gilson, dated May 21, 2018)]

In furtherance of Mr. Mell's commitment to remain in New Jersey during the pendency of his criminal proceedings, Mr. Van Gilson owner of Platinum Helicopters, LLC details his business relationship with WFNW, LLC and his company's lease of the helicopter owned by Brad Mell, along with the two planes owned by Aero Care Services, LLC.

Mr. Van Gilson stated that AERO Care Services, LLC owns two airplanes and WNFN, LLC owns one helicopter. Mr. Van Gilson's company owns four helicopters. All five (5) helicopters (including the one owned by WNFN, LLC) are housed at Princeton Airport, specifically at Mr. Van Gilson's hanger. Mr. Mell does not have any access to Mr. Van Gilson's hanger or permission to enter Princeton Airport's facilities. Mr. Van Gilson utilizes three contract pilots for his helicopter aviation business. None of these pilots know Mr. Mell, nor does Mr. Mell know these three pilots. Mr. Van Gilson stated that he is also able to change the locks to the cabin of the WNFN, LLC helicopter so that he cannot access it. Further, Mr. Van Gilson is the only person licensed and insured to fly the helicopter owned by WNFN, LLC. [Exhibit "Q" (Interview of Evan Van Gilson, dated May 21, 2018)]

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Furthermore, along with the Mr. Mell's Somerset County Airport Agreement, Mr. Van Gilson states that not only is the hangar secured, it is also adjacent to the NJ State Police hangar, which is manned 24 hours a day by State Police personnel.

The hangar is secured by the airport and a tug is needed to bring the plane out of the hangar. The airport is able to re-key the hangar, restricting access to Mr. Mell. Further, the NJ State Police hangar is adjacent to this hangar, and that hangar is manned 24 hours a day by State Police personnel.
[Exhibit "Q" (Interview of Evan Van Gilson, dated June 11, 2018)]

On June 7, 2018 Mr. Coleman conducted a follow-up interview with Mr. Van Gilson in connection to Mr. Van Gilson's earlier representations that the locks at the hangar in Princeton and Somerset Airport would be changed.

Since our prior interview, Van Gilson change the locks on both hangar doors (Princeton Airport and two door locks at Somerset Airport), to ensure that Mr. Mell could not gain access to any of the aircraft housed either hangar.

Mr. Van Gilson also stated that he changed the lock on the tug required to pull the fixed wing airplane, the King Air 200 from the Somerset Airport hangar.
[Exhibit "Q" (Interview of Evan Van Gilson, dated June 11, 2018)]

It is our firm belief that these exhibits, along with our previous submission demonstrates Mr. Mell's willingness to comply with any and all conditions of bail established by the Court.

Very Truly Yours,
THE BIANCHI LAW GROUP, LLC
Attorney for Steven Bradley Mell


ROBERT A. BIANCHI, ESQ

EXHIBIT Q



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CASE NAME: U.S. Vs. Steven B. Mell
INVESTIGATOR: Daniel Coleman
REPORT OF: Interviews of Evan Van Gilson
DATE: June 11, 2018

May 21, 2018, Monday
1:05 PM

-As requested by the Bianchi Law Group, the undersigned investigator conducted an interview of Evan Van Gilson, 20 Rummel Road, Milford, NJ, (908) 399-7215. The interview was conducted at 450 Springfield Avenue, Summit, NJ. Mr. Van Gilson is a long-term associate of Steven Bradley Mell and owns an aviation business. Mr. Van Gilson is a former law enforcement officer and his father was the former police chief of Holland Township, NJ. Mr. Van Gilson and Mr. Mell have a business arrangement regarding aircraft that are owned by an aviation company owned by AERO Care Services, LLC.

Mr. Van Gilson reported that he had conversations with Steven Bradley Mell regarding coyotes on his property. Mr. Van Gilson stated that he recalled the conversation about the coyotes with Mr. Mell began in the first week of May, 2018. Mr. Van Gilson stated that he and Mr. Mell attended a three day helicopter instruction course at Northeast Philadelphia Airport, 05/03/2018 through 03/05/2018. Mr. Van Gilson flew to Mr. Mell's residence (Mr. Mell's residence has a helipad) on the morning of May 3, 2018. Mr. Van Gilson recalls saying to Mr. Mell that he should keep his new puppy (Mr. Van Gilson described it as a husky mix breed), away from the tail rotor of the helicopter, as the dog could be struck by the rotor. Mr. Mell then proceeded to tell Mr. Van Gilson about an incident that he had involving two coyotes and his dog. Mr. Mell said to Mr. Van Gilson, "Hey, last night I had two coyotes in the yard." Mr. Van Gilson responded, "Why didn't you shoot it?" Mr. Mell told him that he did not have a gun and Mr. Van Gilson stated, "You should get one." Mr. Mell told him that the incident took place during the daytime and the coyotes were 100 yards from Mr. Mell and his dog. Mr. Van Gilson told Mr. Mell that the situation was potentially very dangerous, as coyotes are nocturnal animals and not usually outside during the day. Mr. Van Gilson lives in a rural area and is aware of the threat that coyotes pose to family pets. They then discussed purchasing a long



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gun (rifle) to protect his (Mr. Mell's) property. Mr. Mell then proceeded to tell Mr. Van Gilson that he did not know where his NJ firearms ID card was. Mr. Van Gilson advised him that he can get a replacement ID card, which he would have to get in any case, because of his change of address from when he first obtained his ID card. Mr. Van Gilson told Mr. Mell that after he received a replacement firearms ID card he would take Mr. Mell to Cabela's in Pennsylvania, to purchase a long gun.

Mr. Van Gilson detailed his relationship with Mr. Mell regarding the aircraft owned by AERO Care Services, LLC and WNFW, LLC. Mr. Van Gilson and his wife own Platinum Helicopters, LLC, a business that provides helicopter services including charter service, instruction, aerial photography and tours. Mr. Van Gilson stated that AERO Care Services, LLC owns two airplanes and WNFW, LLC owns one helicopter. Mr. Van Gilson's company owns four helicopters. All five (5) helicopters (including the one owned by WNFW, LLC) are housed at Princeton Airport, specifically at Mr. Van Gilson's hangar. Mr. Mell does not have any access to Mr. Van Gilson's hangar or permission to enter Princeton Airport's facilities. Mr. Van Gilson utilizes three contract pilots for his helicopter aviation business. None of these pilots know Mr. Mell, nor does Mr. Mell know these three pilots. Mr. Van Gilson stated that he is also able to change the locks to the cabin of the WNFW, LLC helicopter so that he cannot access it. Further, Mr. Van Gilson is the only person licensed and insured to fly the helicopter owned by WNFW, LLC.

AERO Care Services, LLC also owns a fixed wing airplane, King Air 200, a twin turbo propeller plane. This plane is housed at Somerset Airport in a hangar shared with another individual. The hangar is secured by the airport and a tug is needed to bring the plane out of the hangar. The airport is able to re-key the hangar, restricting access to Mr. Mell. Further, the NJ State Police hangar is adjacent to this hangar, and that hangar is manned 24 hours a day by State Police personnel.

AERO Care Services, LLC also owns a jet. This jet is housed at Lehigh Valley International Airport in Allentown, PA, which he described as a "major airport." Neither Mr. Van Gilson nor Mr. Mell know how to fly the jet and Mr. Van Gilson stated that Mr. Mell would probably crash the jet if he attempted to pilot it.

1:55 PM, the interview was concluded



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June 7, 2018, Monday

3:00 PM

-The undersigned investigator conducted a follow-up interview of Evan Van Gilson, 20 Rummel Road, Milford, NJ, (908) 399-7215. Since our prior interview, Van Gilson changed the locks on both hangar doors (Princeton Airport and two door locks at Somerset Airport), to ensure that Mr. Mell could not gain access to any of the aircraft housed either hangar.

Mr. Van Gilson also stated that he changed the lock on the tug required to pull the fixed wing airplane, the King Air 200 from the Somerset Airport hangar.

Daniel Coleman
Owner, Creative Solutions Investigative Services